

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DIONNE MARSHALL and LUCIA GOMEZ,
on behalf of themselves and all others similarly
situated

Plaintiffs,

v.

DEUTSCHE POST DHL and DHL EXPRESS
(USA) INC.,

Defendants.

Case No.: 13-CV-01471 (RJD)(JO)

NOTICE OF MOTION

**NOTICE OF MOTION FOR: (1) FINAL APPROVAL
OF CLASS ACTION SETTLEMENT; (2) APPROVAL OF CLASS AND
INDIVIDUAL RELEASES; AND (3) APPROVAL OF PLAINTIFFS' REQUEST FOR
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS**

PLEASE TAKE NOTICE, that on July 9, 2015, in the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, before the Honorable Raymond J. Dearie, Plaintiffs will move this Court for an Order for: (1) final approval of the class action settlement of this litigation; (2) approval of class and individual releases; and (3) approval of Plaintiffs' request for attorneys' fees, reimbursement of expenses and service awards for the class representatives. Submitted in support of the motion are the accompanying memoranda of law and the Declaration of Lee S. Shalov, together with exhibits attached thereto.

Dated: New York, New York
June 26, 2015

Respectfully submitted,

/s Lee S. Shalov

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